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6 Attorneys for Defendant
MITSUI O.S.K. LINES, LTD.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

12 | GEORGINA HENSON

Case No.:

13 Plaintiff,

**AFFIDAVIT OF KATHARINE ESSICK
SNAVELY IN SUPPORT OF NOTICE
OF REMOVAL**

15 MITSUI O.S.K. LINES, LTD., and DOES 1 through 20, inclusive

Defendants.

19 I, Katharine Essick Snavely, declare as follows:

20 1. I am an attorney at law licensed to practice before all the courts of the State of
21 California and before this Court, and am an associate in the law firm of Emard Danoff Port
22 Tamulski & Paetzold LLP, attorneys for Mitsui O.S.K. Lines, Ltd., defendant to this action. I
23 have personal knowledge of all the facts stated herein, and I could and would testify competently
24 thereto if called upon as a witness to do so.

25 2. I have read plaintiff Georgina Henson's Longshoreman's Complaint for Damages
26 for Personal Injuries (33 U.S.C. §§905(b), 933). Plaintiff's allegations indicate that the amount
27 in controversy exceeds \$75,000.00. In the Complaint, Plaintiff alleges that she "did sustain

1 severe painful and disabling injuries to her right knee, left hip and head,” and that she “has been
2 unable to engage in her normal and usual calling, and will suffer a diminution in future earning
3 capacity.”

4 3. Based on the allegations in the Complaint, I am informed and believe that Plaintiff
5 was, and still is, a citizen of the State of California. Defendant Mitsui was, at the time of the
6 filing of this action, and still is, incorporated in the Japan, and has its principal place of business
7 in Tokyo, Japan.

8 I declare under penalty of perjury under the laws of the State of California that he
9 foregoing is true and correct and that this declaration was executed on May 8, 2008, at San
10 Francisco, California.

Katharine Essick Snavely

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